



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7


11201 Renner Boulevard
Lenexa, Kansas 66219

SEP 30 2016

ACTION MEMORANDUM AMENDMENT

SUBJECT: Request approval of a 12-month emergency exemption and Removal Project Ceiling Increase for the PCE Chestnut Site RV002, Atlantic, Cass County, Iowa

FROM: for Susan Fisher, On-Scene Coordinator 
Response and Removal North Section

THRU: Dave Williams, Chief 
Response and Removal North Section

TO: Mary P. Peterson, Director
Superfund Division

Site ID: B7A4 (RV002)
CERCLIS ID: IAN000703467
Category of Removal: Time-critical
Nationally significant/Precedential: No

I. PURPOSE

The purpose of this Action Memorandum Amendment is to request a 12-month exemption and project ceiling increase for the ongoing fund-lead, time-critical removal action at the PCE Chestnut Street Site (Site), located in Atlantic, Cass County, Iowa. The original Action Memorandum, dated September 17, 2015, approved an emergency removal action. Hazardous substances have been removed from the site since this removal action commenced in fall 2015. However, recent investigations have shown the continued presence of hazardous substances in an onsite structure which continues to pose unacceptable risks to human health.

II. SITE CONDITIONS AND BACKGROUND

Site Name: PCE Chestnut Site
Superfund Site ID#: B7A4
CERCLIS Number: IAN000703467
CERCLIS Sequence #: RV002, Amendment 1
Site Location: Atlantic, Cass County, Iowa
Lat/Long: 41.4036007 degrees (°) north/-95.0138776° west
Potentially Responsible Party: PRP search ongoing
NPL Status: The Site is not listed on the NPL
Removal Category: Time-Critical
Nationally Significant: No

30247500



Superfund

A. Site Description

1. Removal site evaluation

See the previously approved Action Memorandum dated September 17, 2015 (attached).

2. Physical location

See the previously approved Action Memorandum dated September 17, 2015 (attached).

3. Site characteristics

See the previously approved Action Memorandum dated September 17, 2015 (attached).

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant.

See the previously approved Action Memorandum dated September 17, 2015 (attached).

5. National Priority List (NPL) status

The Site is not currently listed on the NPL.

6. Maps, pictures and other graphic representations

See the previously approved Action Memorandum dated September 17, 2015 (attached).

B. Other Actions to Date

1. Previous actions

See the previously approved Action Memorandum dated September 17, 2015 (attached).

2. Current actions

In October 2015 the following hazardous substances were removed from the property at 500 Chestnut Street (the "building"):

Number of Containers	Volume (gallons)	Contents
1	5	Aerosols
1	10	Flammable Liquids
1	55	Trichloroethene
3	55	Tetrachloroethene
2	30	Sodium Hydroxide Solution
1	55	Corrosive Liquids
1	5	Hydrofluoric Acid
1	20	Corrosive Liquids
1	16	Hypochlorite Solutions

In March 2016, an indoor air sample was collected. Sample results were above residential risk levels in the indoor air for PCE and TCE.

In September 2016, EPA removed dry cleaning equipment and carpet from the main floor of the building. Carpet samples showed high concentrations of PCE. An indoor air sample was subsequently collected to determine if the contamination had been removed from the building. Sample results

were above residential risk levels in the indoor air for PCE, i.e., the contamination had not been fully removed from the building.

Below the carpet is a sub floor with significant staining. Removal of the sub floor and any related materials need to be addressed to eliminate remaining contamination inside the building, and the immediate indoor air risk to the residences in the apartments above the main floor. These actions will extend beyond the one year limitation on fund-lead response (removal start date for this action is October 5, 2015) as set forth in CERCLA §104(c)(1). Also, additional funding is needed to address the contaminated media that were not accounted for in the original action memorandum for the Site.

Sampling results are summarized below.

Air Sample Results			PCE ug/m3	TCE ug/m3
Residential Indoor Air Removal Action Levels			42	2.0
Residential Sub-slab Soil Gas Screening Levels			1400	67
Sample ID	Sample Type	Collection Date		
6837-1 (main floor)	Indoor Air	7/13/2015	500	49.2
Mobile Lab	Sub-slab	7/22/2015	885	ND
Mobile Lab (basement)	Indoor Air	7/22/2015	243.5	7.14
6999-21	Indoor Air	3/8/2016	410	2.2
500Chestnut IA	Indoor Air	9/13/2016	286	ND

ug/m3 = micrograms per cubic meter

PCE = Tetrachloroethene

TCE = Trichloroethene

ND = Non Detect

500 = sample results exceed removal action levels

C. State and Local Authorities' Roles

1. State and local actions to date

See the previously approved Action Memorandum dated September 17, 2015 (attached).

2. Potential for continued State/local response

See the previously approved Action Memorandum dated September 17, 2015 (attached).

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

PCE, TCE, and its degradation products are hazardous substances as defined in section 101(14) of CERCLA and as designated in 40 C.F.R. § 302.4. PCE and TCE have been detected in indoor air samples in the building at levels that exceed their established removal action levels (RALs).

PCE is a man-made chemical that is widely used for dry cleaning clothes and for metal degreasing. It evaporates easily into the air and has a sharp, sweet odor. Exposure to PCE vapors at very high concentrations (particularly in closed, poorly ventilated areas) can cause dizziness, headaches, drowsiness, confusion, nausea, difficulty in speaking and walking, unconsciousness and death. PCE has been shown to cause liver tumors in mice and kidney tumors in rats. It has been determined that PCE is a Class 2A carcinogen via inhalation based on long-term exposure.

TCE is defined as a hazardous substance in section 101(14) of CERCLA, and is designated as a hazardous substance in 40 CFR § 302.4. The Agency for Toxic Substances and Disease Registry reports that inhalation exposure to TCE at very high concentrations may affect the central nervous system, with symptoms such as dizziness, headaches, confusion, euphoria, facial numbness and weakness. Recent studies have linked TCE with fetal structural heart malformations associated with inhalation exposure, at relatively low levels, during the prenatal period.

Where the EPA determines, based on the factors set forth in 40 C.F.R. § 300.415(b)(2), that there is a threat to public health or welfare or the environment, the lead agency may take any appropriate removal action to abate, prevent, minimize, stabilize, mitigate or eliminate the release or threat of release. The factors in 40 C.F.R. § 300.415(b)(2) that apply to this Site are:

300.415(b)(2)(i) – Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

See the previously approved Action Memorandum dated September 17, 2015 (attached).

300.415(b)(2)(vi) – Weather conditions may cause hazardous substances or pollutants to migrate or to be released.

See the previously approved Action Memorandum dated September 17, 2015 (attached).

300.415(b)(2)(vi) – Threat of fire or explosion.

See the previously approved Action Memorandum dated September 17, 2015 (attached).

300.415(b)(2) – The availability of other appropriate federal or state response mechanisms to respond to the release.

See the previously approved Action Memorandum dated September 17, 2015 (attached).

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the continued removal action, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

Emergency Exemption

The NCP at 40 C.F.R. § 300.415(b)(2) authorizes the EPA to take time-critical response actions at those facilities that pose a threat to human health or the environment. A PCE vapor plume has been documented at this Site, and as a result, there is an immediate risk to public health and welfare. The floors above the main floor of the building contain residential apartments. The occupants are potentially breathing air containing PCE vapors. Continued response actions are immediately required to prevent, limit, and mitigate an emergency. Response actions are projected to go beyond the 12-month statutory limitation.

PCE has been detected as high as 500 ug/m³ in indoor air samples, current levels of PCE in the indoor air are 286 ug/m³, which are levels that the EPA considers to present significant health threats. An immediate threat exists where ambient air exceeds the established RALs. Assistance from the state and local governments cannot be provided on a timely basis and a viable PRP has not been identified. Because the response actions needed at the site are immediately required, the removal action should be continued at the Site, including the immediate removal of additional PCE contaminated flooring and any additional materials as necessary

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

See the previously approved Action Memorandum dated September 17, 2015 (attached).

2. Contribution to remedial performance

The Site is not listed on the NPL

3. Applicable or Relevant and Appropriate Requirements (ARARs)

See the previously approved Action Memorandum dated September 17, 2015 (attached).

4. Project Schedule

See the previously approved Action Memorandum dated September 17, 2015 (attached).

It is anticipated that response actions are required beyond the statutory 12-month period to prevent further unacceptable exposures.

B. Estimated Costs

The costs associated with this removal action are estimated as follows:

	Current	Proposed	Amended
<u>Extramural costs:</u>	<u>Ceiling</u>	<u>Increase</u>	<u>Total</u>
Removal Costs	\$100,000	\$ 50,000	\$150,000
Contingency (20 percent)	<u>\$ 20,000</u>	<u>\$ 10,000</u>	<u>\$ 30,000</u>
Removal Project Ceiling	\$120,000	\$ 60,000	\$180,000

EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Refer to the enforcement section for breakout of these costs.

VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

The actions proposed herein for the Site should be initiated immediately. Should these actions be delayed, the potential threats to human health and the environment will continue and increase.

VIII. OUTSTANDING POLICY ISSUES

None.

IX. ENFORCEMENT

See the previously approved Action Memorandum dated September 17, 2015 (attached).

The total EPA costs for this removal action based on full cost-accounting practices are estimated to be:

Direct Extramural Costs	\$ 120,000	\$ 60,000	\$ 180,000
Direct Intramural Costs	\$ 22,728	\$ 11,292	\$ 34,020
EPA Indirect (54.37%)	<u>\$ 77,601</u>	<u>\$ 38,762</u>	<u>\$ 116,363</u>
Total Project Costs	\$220,329	\$ \$110,054	\$330,383

Direct costs include direct extramural and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost-accounting methodology effective October 2, 2000. These estimates do not include prejudgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to recovery. The indirect rate increased from 50.21% to 54.37% as of September 30, 2015. The indirect charged to the proposed ceiling increase reflects the new 54.37% rate.

X. RECOMMENDATION

This decision document represents the selected removal action for the PCE Chestnut Site in Atlantic, Iowa, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site continue to meet NCP § 300.415(b) criteria for a removal action, and I recommend your approval of this proposed project ceiling increase and the 12-month emergency exemption. The amended removal project ceiling, if approved will be \$180,000. This amount comes from the Regional Removal Allowance.

Approved:

Mary P. Peterson
Mary P. Peterson, Director
Superfund Division

9/30/2016
Date

Attachments: Action Memorandum dated September 17, 2015.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

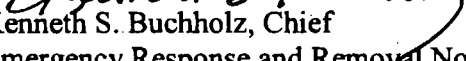
11201 Renner Boulevard
Lenexa, Kansas 66219

SEP 17 2015

\$250,000/\$50,000 ACTION MEMORANDUM

SUBJECT: Emergency Removal Action at the PCE Chestnut Site pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104

FROM: Susan Fisher, On-Scene Coordinator
Emergency Response and Removal North Branch

THRU: 
Kenneth S. Buchholz, Chief
Emergency Response and Removal North Branch

TO: Mary P. Peterson, Director
Superfund Division

Site ID# B7A4, RV002

I. Purpose

The purpose of this Action Memorandum is to document the decision to initiate the emergency response action described herein for the PCE Chestnut Site (Site) located in Atlantic, Cass County, Iowa, pursuant to the On-Scene Coordinator's (OSC) delegated authority under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104 and EPA Regional Delegation R7-14-002. On September 8, 2015, the U.S. Environmental Protection Agency conducted an assessment of the chemicals inside a property in downtown Atlantic, Iowa. The sampling was part of an investigation into the past releases of tetrachloroethene (PCE) and trichloroethene (TCE) at the Site. The purpose of this removal is to properly dispose of the hazardous substances that were identified during the Removal Assessment.

II. Site Information

A. Site Description

Site Name:	PCE Chestnut Site
Superfund Site ID (SSID):	B7A4
CERCLIS Number:	IAN000703467
CERCLIS Sequence #:	RV002
Site Location:	Atlantic, Cass County, Iowa
Lat/Long:	41.4036007 N, -95.0138776 W
Potentially Responsible Party (PRP):	Not Identified
NPL Status:	NPL
Estimated Removal Start Date:	September 23, 2015

B. Site Background

1. Removal site evaluation

A time-critical removal Action Memorandum was signed by the EPA on May 18, 2015, which provided for, among other things, sampling in the Atlantic area to determine whether there are any potential or completed vapor exposure pathways for Site contaminants. Through this sampling, PCE vapors were found in buildings in downtown Atlantic, Iowa, that presented significant health threat due to inhalation hazards. A copy of that Action Memorandum is attached. As part of that removal action, indoor air and subslab soil gas samples were collected in downtown Atlantic, Iowa, in July 2015. Results of the sampling event showed a concern with the indoor air at 500 Chestnut, which lead to a removal assessment at that address.

During the week of September 8, 2015, the EPA conducted an assessment of the property at 500 Chestnut Street, Atlantic, Iowa. The assessment was part of an investigation into the past release of PCE and TCE at the Site.

The property at 500 Chestnut Street is located in the commercial district of Atlantic, Iowa. The main level of the building is used for commercial purposes but is currently unoccupied. The floors above the main level are used for residential apartments. The previous owner of the property operated a dry cleaning operation on the main floor. The operator of the dry cleaner left the following hazardous chemicals in the building when he sold it to the current owner:

Located on the main floor:

- Two 15-gallon poly drums labeled "Builder C NP", a liquid with a pH of 14. This product was labeled corrosive. It was also noted that solid crystals had formed on top of the container and were falling to the floor of the building.
- One half-full 50-lb. bag of white solid powder labeled Tri Kovar Alkali (an ingredient is sodium hydroxide) with a pH of 13.
- A large dry cleaning machine containing 21 gallons of amber liquid in the east tank and 13 gallons of clear liquid in the west tank. Both tanks are suspected to contain PCE.

Located in the basement:

- Approximately 30 to 40 small containers, a portion of which appeared to have original labels. Some of the containers were spot cleaners and others were dry cleaning-related chemicals. One container was labeled "Picrin", whose main ingredient is TCE.
- Other dry cleaning chemicals, detergents, etc., remain inside the building.

PCE, TCE and materials with a pH above 12.5 are listed hazardous substances as defined in 40 C.F.R. § 261.22.

2. Physical location and Site characteristics

The Site is located at, and in the area of, 500 Chestnut Street, Atlantic, Iowa. The approximate coordinates of the Site are latitude 41.407861° North, longitude 95.012939° West. The city of Atlantic has a population of 7,008 (U.S. Census Bureau 2012) and is located in Cass County, Iowa, approximately 45 miles northeast of Council Bluffs and 75 miles west of Des Moines.

The Site is located in downtown Atlantic, Iowa, where there is a mix of commercial and residential properties. During a vapor intrusion assessment conducted in March 2015 by the EPA for the PCE Former Dry Cleaners Site, the EPA discovered another former dry cleaner site (PCE Chestnut Street) to the west of the PCE Former Dry Cleaners Site. The suspected sources of contamination are former dry cleaning operations located on Chestnut Street, including 317 Chestnut Street, 500 Chestnut Street and 320 Chestnut Streets, Atlantic, Iowa. The exact quantity of contaminants and extent of soil and groundwater contamination is unknown at this time.

From approximately 1991 to 2012 the Cass County Cleaners, a laundry and dry cleaning service, operated at 500 Chestnut Street on the main level of the building. The exact dates of operation are unknown. As of April 2015, the main level of the building was unoccupied. At this time not much is known about the Cass County Cleaners, but the business registered with the state of Iowa as a limited liability company in 1998. The owner of the building when the dry cleaners was in operation sold the building to the current owner sometime after the dry cleaners closed in 2012.

Vapor intrusion sampling was conducted at 500 Chestnut Street the week of July 13 and 20, 2015. Vapor intrusion sampling results for indoor air exceed the removal action levels (RALs) for PCE and TCE. However, subslab soil gas sample results were below levels of health concern. The results indicate that the vapor intrusion pathway is not complete, and further sampling will need to be conducted. The majority of the basement floor is concrete; however the back part of the building has only a soil floor. The portion of the basement floor that is concrete has several cracks and is not in good condition, increasing the potential for the release of PCE and TCE into the environment. Sampling of the soil floor and beneath the concrete will be conducted in the future. The results also indicate that there is a release of PCE and TCE inside the building. The table below shows indoor air and subslab soil gas results.

Air Sample Results			PCE µg/m ³	TCE µg/m ³
Residential Indoor Air Removal Action Levels			42	2.1
Residential Subslab Soil Gas Screening Levels			1400	70
Sample ID	Sample Type	Collection Date		
6837-1	Indoor Air	7/13/15	500	49.2
Mobile Lab	Sub Slab	7/22/15	885	ND
Mobile Lab	Indoor Air	7/22/15	243.5	7.14

µg/m³ = micrograms per cubic meter

PCE = tetrachloroethene

TCE = trichloroethene

ND = non detect

6837 = laboratory sample identification number

500 = sample results exceed removal action levels

3. Release or substantial threat of release into the environment of a hazardous substance or pollutant or contaminant

Field screening analysis of the chemicals inside the building, as well as chemical container labels, indicate that hazardous substances have been released into the indoor air and possibly into the environment. The basement floor of the building is not in good condition; further assessment of the exposed soil and the soil beneath the concrete needs to be conducted. PCE and TCE as well as substances with a pH of 12.5 are hazardous substances as defined in CERCLA Section 101(14) under 40 CFR § 261.4(b), if the substance exhibits any of the characteristics identified in 40 C.F.R. § 261.20 through 261.24, or as listed in 40 C.F.R. § 302.4.

III. Threats to Public Health, Welfare or the Environment

1. Nature of Actual or Threatened Release of Hazardous Substances or Pollutants or Contaminants

TCE and PCE are typically used in dry cleaning operations, and these chemicals have been found inside the building where a former dry cleaning business operated. Additionally, other dry cleaning chemicals are in the building, including chemicals releasing from their containers with a pH of 14.

B. Check Applicable Factors (from 40 CFR 300.415) Which Were Considered in Determining the Appropriateness of a Removal Action:

- ☒ Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].
- ☐ Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].
- ☒ Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that pose a threat of release [300.415(b)(2)(iii)].
- ☐ High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].
- ☒ Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(v)].
- ☒ Threat of fire or explosion [300.415(b)(2)(vi)].
- ☒ The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].
- ☐ Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

IV. Selected Removal Action and Estimated Costs

1. Situation and Removal Activities to Date

1. Current situation

Vapor intrusion sampling was conducted at 500 Chestnut Street during the weeks of July 13 and 20, 2015. Vapor intrusion sampling results for indoor air exceed the RALs for PCE and TCE. However, subslab soil gas sample results were below levels of health concern. The results indicate that the vapor intrusion pathway is not complete, and further sampling will need to be conducted. The majority of the basement floor is concrete; however, the back part of the building has only a soil floor. The portion of the basement floor that is concrete has several cracks and is not in good condition. The exposed soil and the soil beneath the concrete in the basement will be further assessed to determine if PCE and/or TCE have been released into the environment. Contaminated soil found above EPA RALs shall be removed and disposed of properly if found during soil assessment activities. The results also indicate that there is a release of PCE and TCE inside the building. The table above shows indoor air and subslab soil gas results.

TCE and PCE have typically been used in dry cleaning operations, and these chemicals are still inside the building. Additionally, other dry cleaning chemicals are in the building, including chemicals releasing from their containers with a pH of 14. Chemicals found inside the building include:

Located on the main floor:

- Two 15-gallon poly drums with "Builder C NP", a liquid with a pH of 14. This product was labeled corrosive. It was also noted that solid crystals had formed on top of the container and were falling to the floor of the building.
- One half-full 50-lb. bag of white solid powder labeled Tri Kovar Alkali (an ingredient is sodium hydroxide) with a pH of 13.
- A large dry cleaning machine containing 21 gallons of amber liquid in the east tank and 13 gallons of clear liquid in the west tank. Both tanks are suspected to contain PCE.

Located in the basement:

- Approximately 30 to 40 small containers, a portion of which appeared to have original labels. Some of the containers were spot cleaners and other were dry cleaning-related chemicals. One container was labeled "Picrin", whose main ingredient is TCE.
- Other dry cleaning chemicals, detergents, etc., remain inside the building.

PCE, TCE and materials with a pH above 12.5 are listed hazardous substances as defined in 40 CFR 261.22.

2. Removal activities to date:

a. State/Local

There have not been any state or local actions to date. The documented PCE- and TCE-contaminated vapor, and the release of chemicals with a pH of 14 inside the building, pose an immediate risk to public health or welfare or the environment. Assistance in responding to this release is unavailable from state or local authorities, and will not be provided on a timely basis.

b. Federal Government/Private Party

No further actions have been taken since the assessment of the property on September 8, 2015.

3. Enforcement

A PRP has not been identified.

B. Planned Removal Actions

1. Proposed action description

The removal action will include the removal of hazardous chemicals as well as any items contaminated with hazardous substances. The PCE and TCE levels within the building, as well as the subslab soil gas, present an actual or potential exposure of hazardous substances, specifically PCE and TCE, to nearby human populations, including the residents in the apartments above the former dry cleaners. The majority of the basement floor is concrete; however, the back part of the building has only a soil floor. The portion of the basement floor that is concrete has several cracks and is not in good condition. The exposed soil and the soil beneath the concrete in the basement will be further assessed to determine if PCE and/or TCE have been released into the environment. Contaminated soil found above EPA RALs shall be removed and disposed of properly if found during soil assessment activities. (A contingency for costs associated with soil removal has been included in the estimated costs.)

2. Contribution to remedial performance

No long-term remedial action at the Site is anticipated. However, the fund-lead actions proposed in this Action Memorandum would not impede any potential future remedial plans or other response actions for the Site.

3. Applicable or relevant and appropriate requirements (ARARs)

Removal actions conducted under CERCLA are required to attain ARARs to the extent practicable. In determining whether compliance with ARARs is practicable, the OSC may consider appropriate factors, including the urgency of the situation and the scope of the removal action to be conducted. An ARAR letter was transmitted to the State of Iowa on September 15, 2015.

4. Project schedule

The response will be initiated on or about September 22, 2015, and will be complete once it has been confirmed by laboratory data that hazardous substances have been removed. Indoor air samples will be collected once the removal is complete to confirm that PCE and TCE no longer exceed RALs in the indoor air. This confirmatory sampling is anticipated to take place within 30 days of the removal of the containers of chemicals from inside the building.

C. Estimated Costs*

Contractor Costs (ERRS/START staff, travel, equipment)	\$100,000
Other Extramural Costs (Strike Team, other Federal Agencies)	0
Contingency Costs (20% of subtotal)	20,000
Total Removal Project Ceiling	\$120,000

* EPA direct and indirect costs, although cost recoverable, do not count toward the removal ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

V. Expected Change in the Situation Should Action be Delayed or not Taken

A delay in action or no action at this Site would increase the actual or potential threats to the public health and/or the environment.

VI. Outstanding Policy Issues

None.

VII. Approvals

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP 40 C.F.R. § 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$120,000. This amount will be funded from the Regional removal allowance.

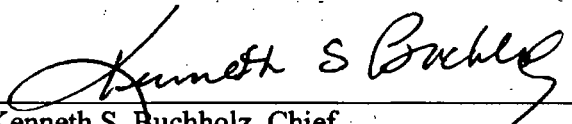

Susan Fisher
Federal On-Scene Coordinator

9/17/2015

Date

VIII. Endangerment Determination under CERCLA Section 106: Hazardous Substances

"Actual or threatened releases of hazardous substances from this Site may present an imminent and substantial endangerment to public health or welfare or the environment."


Kenneth S. Buchholz, Chief
Emergency Response and Removal North Branch

9/17/2015
Date